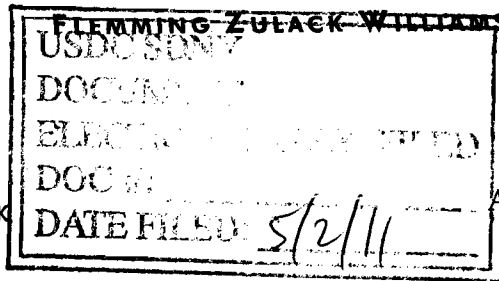
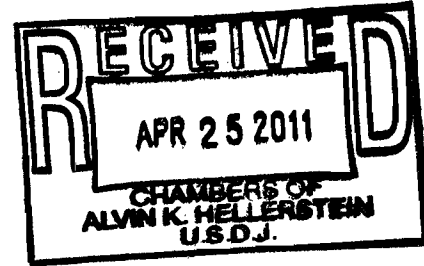
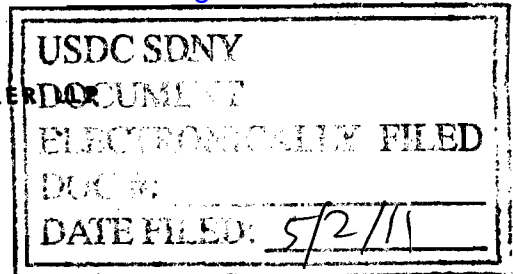


LAW OFFICES
ONE LIBERTY PLAZA
NEW YORK, NEW YORK
10006-1404
(212) 412-9500
FAX (212) 964-9200



April 22, 2011



By E-Mail

RICHARD A. WILLIAMSON

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1050
New York, New York 10007-1312

Re: In Re September 11 Litigation, 21 MC 101 (AKH)

Dear Judge Hellerstein:

Our clients have been asked by Liaison Counsel for the Settling Plaintiffs whether the WTCP Plaintiffs¹ will voluntarily waive all rights of appeal or other relief from the Second Circuit's April 8, 2011 Decision affirming this Court's July 1, 2010 Opinion and Order approving their settlement with the Aviation Defendants.

In the interest of moving forward and allowing the vast majority of the settlement funds in escrow to be promptly released to all but four of the Settling Plaintiffs,² the WTCP Plaintiffs hereby notify Your Honor, the Settling Parties and the Escrow Agent of the settlement funds, that they waive all appellate and other rights as to the release of funds to the Settling Plaintiffs, except as to four of the Settling Plaintiffs. Those four are the defendants over whom the WTCP Plaintiffs have priority rights as set forth in *World Trade Center Properties LLC, et al. v. Great Lakes Reinsurance (UK) PLC, et al.* (10 CV 1642 (AKH)) (the "Priority of Recovery Action").

In the Priority of Recovery Action, the WTCP Plaintiffs (other than 7 World Trade Company, L.P.) assert contractual priority of recovery with respect to the settlement proceeds currently in escrow allocable to the following four entities which are both Settling Plaintiffs and Priority of Recovery Action defendants in actions before

WRITER'S DIRECT DIAL
(212) 412-9530
rwilliamson@fzwz.com

¹ The WTCP Plaintiffs are World Trade Center Properties LLC, 1 World Trade Center LLC, 2 World Trade Center LLC, 3 World Trade Center LLC (formerly known as "5 World Trade Center LLC"), 4 World Trade Center LLC, and 7 World Trade Company, L.P.

² The Settling Plaintiffs are the plaintiffs in the individual docket numbers referenced in the Second Circuit's April 8, 2011 Decision.

*The court ~~declined~~ declines to
issue an order, except in response
to a properly supported motion.
4-29-11
Al K. Hellerstein*

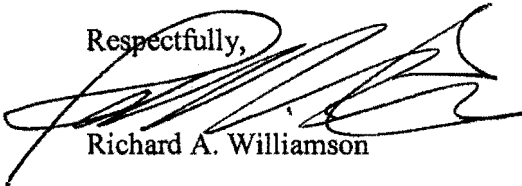
Honorable Alvin K. Hellerstein
April 22, 2011
Page 2

Your Honor: Great Lakes Reinsurance (UK) PLC ("Great Lakes"), Certain Underwriters at Lloyd's, London syndicates numbered 33, 1003, 2003, 1208, 1243, 0376, 1225, 1212, 79, 506 and 2791 ("Lloyd's"), QBE Insurance (Europe) Ltd. F/K/A QBE International Insurance Ltd. ("QBE"), and Industrial Risk Insurers ("IRI").

The WTCP Plaintiffs contend that all of the settlement amounts allocable to three of the defendants in the Priority of Recovery Action (all except IRI) belong to the WTCP Plaintiffs. As to the fourth Priority of Recovery Action defendant, IRI, the WTCP Plaintiffs have a contractual right to share in recoveries. In addition, all of the Priority of Recovery Action defendants (except IRI) are foreign entities, and it could well be extremely difficult to collect if the WTCP Plaintiffs are successful in the Priority of Recovery Action. The WTCP Plaintiffs respectfully urge that no monies should be released to the Priority of Recovery Action defendants until their declaratory judgment action is resolved.

We are informed by Ty Childress, Esq. of Jones Day, counsel for the Plaintiffs in the Priority of Recovery Action, that the parties in that action have asked Your Honor to schedule a conference in the very near future. Perhaps this subject can be discussed with the Priority of Recovery Action defendants if Your Honor sees fit to do so.

Respectfully,

A handwritten signature in black ink, appearing to read "Richard A. Williamson", is written over the typed name.

Richard A. Williamson

cc: All Liaison Counsel in 21 MC 101 (by e-mail)
All Counsel in 10 CV 1642 (by e-mail)
Escrow Agent Christopher N. Koenig, JPMorgan Chase Bank, N.A. (by fax and Federal Express)